

ISMAIL J. RAMSEY (CABN 189820)
United States Attorney

THOMAS A. COLTHURST (CABN 99493)
Chief, Criminal Division

NEAL C. HONG (ILBN 6309265)
Assistant United States Attorney

150 Almaden Boulevard, Suite 900
San Jose, California 95113
Telephone: (408) 535-5081
neal.hong@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAMES LUNA,

Defendant.

NO.: **CR 23-71503-MAG**

MOTION TO SEAL DOCUMENTS

UNDER SEAL

The United States, by and through its counsel, Assistant United States Attorney NEAL C. HONG, moves this Court for an order sealing the government's application for a sealing order, the sealing order, the affidavit for a complaint, the complaint, and all attachments in the above-referenced investigation. Disclosure of the specified documents might jeopardize the progress of this ongoing investigation that is neither public nor known to unidentified co-conspirators of the investigation.

Accordingly, the United States requests that the Court seals these documents, except that the Clerk of Court shall provide copies of the sealed documents to employees of the United States Attorney's Office. The United States further requests that the United States Attorney's Office be

//

//

permitted to share these documents as necessary to comply with its discovery obligations, and with the United States Postal Inspection Service.

DATED: October 4, 2023

Respectfully submitted,

ISMAIL J. RAMSEY
United States Attorney

/s Neal Hong
NEAL C. HONG
Assistant United States Attorney